



minutes. Additionally, the Freehold Township facility is overcrowded with long waiting lines for service. Moreover, there is inadequate parking at the Freehold Township post office adding to the time that it would take for a consumer who has access to the facility by motor vehicle to actually gain entry to the post office.

B. The other "proximate" post office facilities are not readily accessible to pedestrian traffic. The walk from Freehold Borough to the Freehold Township facility is one fraught with extreme danger. A pedestrian consumer would have to walk on County Route 537, a heavily-trafficked roadway within inadequate sidewalk availability. A pedestrian would have to cross over the entrance to the very large and extremely well-used Freehold Raceway Mall. A pedestrian would also have to cross over the bridge over the Route 33 by-pass and cross many unprotected entrances to various other businesses, including a hotel, strip mall, Walgreen's Shopping Center and another grocery store-anchored shopping center. There is bus service from Freehold Borough to the nearby CentraState Medical Center. The bus provides for an early morning round trip, a midday round trip and a late afternoon round trip. The bus stop is approximately 2,000 feet from the Freehold Township post office. The turnaround time between the drop-off at CentraState Medical Center and the pickup of passengers at the medical center for the return trip to Freehold Borough is nine (9) minutes. Accordingly, it would be impossible for a consumer to take the bus to the medical center, utilize the post office and be able to make it back for the return trip to Freehold Borough. A consumer would only be able to take the bus one way, either to the post office or back to Freehold Borough from the post office. There is no other public transportation available to access the Freehold Township post office. Consumers would be forced to attempt to traverse the route on foot or to pay money for a private taxi cab service.

The other two (2) locations in Adelphia and Tenent are not easily accessed. They are more distant from the Freehold Township location and have no bus service. The majority of the walking route to either location has no sidewalks for pedestrian traffic.

It is clear that the alternate postal facilities are inadequate to provide postal services to the residents, businesses and government offices in Freehold Borough. The postal service failed to give due consideration to the effect of such closing on the community which is served by the Freehold Borough/Lafayette Street facility.

4. Freehold Borough is a community of approximately 12,000 people. The Borough population had been consistently between 10,000 and 11,000 people. However, the 2010 census indicates that the population as of January 1, 2010 was 12,052, representing a nearly 10% increase. Because of its affordable housing and access to public transportation, Freehold Borough has seen a major increase in immigrants moving to the community over the last twenty (20) years. The Hispanic population in Freehold Borough, as evidenced by the 2010 census, is approximately 43% of the population. Freehold Borough has been attractive because it offers affordable housing, a hub for public transportation and a geographic sphere of

affluence. The increase and concentration of immigrants has created a number of challenges for the community, the most obvious being the language barrier. Additionally, the majority of the Hispanic immigrants residing in Freehold Borough are young and unskilled laborers who, due to their undocumented status, are unable to obtain driver's licenses. Accordingly, the Hispanic immigrant population in Freehold Borough is almost completely pedestrian oriented. For the reasons set forth above, this pedestrian population will suffer greatly from the closure of the Freehold Borough/Lafayette Street postal facility.

Freehold Borough is the third poorest municipality per capita in Monmouth County. The closure of the Freehold Borough postal facility will have a negative economic impact on the residents of the community who cannot afford the private taxi service that would be required to transport them to the postal facilities in the "proximate" area. The Postal Service failed to give due consideration to the effect of the closure of the Freehold Borough/Lafayette Street postal facility on the Hispanic immigrant community

5. The reliance of the Postal Service on economic reasons for the closure of the Freehold Borough facility is clearly misplaced. As set forth more fully in the Participant Statement of the Freehold Center Management Corporation, incorporated herein, the Freehold Borough facility was earning \$3.00 of profit for every \$1.00 of costs, despite the severe downturn in the economy.

For the above reasons, and those set forth more fully in the Participant Statement of the Freehold Center Management Corporation, incorporated herein, it is clear that the decision of the Postal Service to close the Freehold Borough ignored the needs of the Freehold Borough community, both residents, businesses and government offices, and is based on faulty economic conclusions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kerry E. Higgins", written over a horizontal line.

Kerry E. Higgins, Esq.  
For the Firm

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